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1/24/2023 12:02 AM CLERK U.S. BANKRUPTCY COURT - WDPA

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: U LOCK INC. a/k/a)	
U-LOCK INC.)	Case. 22-20823-GLT
)	
Debtor.)	
)	
	.)	

REPLY TO THE RESPONSE OF CHRISTINE BIROS (ENTRY 298) RE SHOW CAUSE

I, George Snyder, declare and state under the penalty for perjury that the following is true and correct (28 USC 1746):

I read the response of Christine Biros. In my response, I addressed the issues relating to me, but after reading Ms. Biros' response, I believe some important things need clarified:

- The pictures Ms. Biros provided are accurate. I had the salvage yard move the
 cars in June 2022 and gave the money to the trustee in July 2022 exactly as
 this Court told me when Ms. Biros requested that they be cleaned up per this
 Court's Order.
- Ms. Biros forgot to tell the Court why her family (Andy Biros and Robert
 Biros) put the "final drives" from the Case 330 excavator on July 13, 2022
 near the highway, from where they disappeared the same day.. (These were not
 on the excavator, but
- 2. Ms. Biros did not explain why the tracks from the excavator were removed and placed into a red dump truck by Robert Biros on October 21, 2022. For the October 21, 2022, theft of the tracks from the excavator, you will see Robert Biros' White Ford Transit and Andy Biros' Honda Pilot. The red dump truck was the guy who came and installed the chain on the property. On November 6, 2022, the excavator was standing up undamaged at U Lock. On November 10, 2022, the Biros family tipped it over. On December 1,

- 2022, the day before the site visit, the excavator is at the Biros site on its side and dented. On December 2, 2022, when Your Honor arrived, it was standing upright. The parts removal and subsequent damage to the machine is why it became a piece of scrap. The tracks and "final drives" are worth money.
- 3. Ms. Biros forgot to tell the Court what happened to the boats. There were two boats on the schedules. The boats were moved by the Biros family on October 6 to a place near the dumpsters. On October 30 they were still in tact. On November 6, 2022, they were shredded and in the dumpster. I do not know what day they were destroyed as I was not allowed on the property because Ms. Biros said I bothered the guy from the red truck who got the excavator tracks.
- 4. Finally, Ms. Biros forgot to tell the story of the front end loader. The picture of it was taken on October 30, 2022.
- 5. I know Ms. Biros may protecting these items from me, and she promised she won't bill the estate for her services in this regard, but I think she should tell the Court where the final drives and tracks to the excavator went and why, what exactly happened to the boats and why, and why she smashed the front end loader.
- 6. It doesn't make any sense to me why they did this because they apparently believed they would be the purchaser of these items. I do not suggest these were items in new condition, but they certainly did not "protect" them in any way and caused damage to them reducing them to scrap.

This is Andy Biros loading the Final Drives from the Case Excavator onto his machine July 13 2022:



Then he moves them up near the highway July 13 2022.



Then they disappeared.

This is October 21, 2022, where they loaded the tracks from the Case Excavator into the red truck. The white truck belongs to Robert Biros.



Here's the truck leaving with the tracks October 21, 2022.



This is the machine November 6 2022 before they broke the windows and dumped it on its

side.



Here's how they placed it on its side at U Lock. This was taken November 10 2022.



This is how it was placed at the Biros property and this was taken December 1, 2022, the day before the site visit.



This is how it was on December 2, 2022, they put it back upside for the judge site visit. The windows are broken. They were not broken before. They actually went and placed it right side up just for show.



Here are the boats when they moved them near their dumpster



Here are the boats smashed in the dumpster



These are the boat trailers all twisted. You can see them holding the boats before the Biros family destroyed the boats and damages the haulers.



This is the Michigan 85iii front end loader. It ran well and was operable. The Biros family used their high lift to push it, improperly using brute force, and dented the rear, the grill, and radiator.



This 23rd day of January 2023.

George Snyder

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